

Ex. 2

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

| | | |
|--------------------------|---|------------------------|
| MISTY BLANCHETTE PORTER, |) | |
| M.D., |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Docket No. 2:17-CV-194 |
| |) | |
| DARTMOUTH-HITCHCOCK |) | |
| MEDICAL CENTER, |) | |
| DARTMOUTH-HITCHCOCK |) | |
| CLINIC, MARY HITCHCOCK |) | |
| MEMORIAL HOSPITAL, and |) | |
| DARTMOUTH-HITCHCOCK |) | |
| HEALTH, |) | |
| Defendants. |) | |

DECLARATION OF ATTORNEY ERIC D. JONES

1. I make this declaration in support of Plaintiff's Motion for Attorneys' Fees (the "Motion") in the above-captioned matter.

Qualifications

2. I have been admitted to practice law since 1994. I have worked at Langrock Sperry & Wool, LLP ("LSW") since 2019, and have been a partner of the firm since 2021. Before practicing at LSW, I was a partner of the firm WrightJones PLC (2014-2019), and a partner of Downs Rachlin Martin PLLC ("DRM") (2002-2014), where I served for several years as the Chair of the Labor and Employment Practice Group. Before DRM, I was a member of the firm Vitt & Jones, PLC (1999-2002). I started my legal career as an Associate at Brooks, McNally, Whittington, Platto & Vitt (1994-1999). My practice over the past three decades has consisted almost entirely of employment and labor law, on behalf of both employers and employees, including litigation of labor and employment disputes.

3. I have represented numerous individual and business clients in litigation throughout Vermont and New Hampshire; I have also handled labor and employment litigations on a *pro hac vice* basis in numerous federal courts throughout the Country (including the Southern District of New York and the Northern District of Illinois). I am admitted to practice before the state and federal courts of Vermont and New Hampshire, the United States Courts of Appeals for the Second and Fourth Circuits, and the United States Supreme Court. I have tried many cases to verdict, including both bench and jury trials, and administrative trials before the National Labor Relations Board Division of Judges. I also have extensive experience handling labor arbitration disputes.

Fees and Billing

4. In October 2024, Plaintiff Misty Blanchett Porter, M.D., engaged LSW to join her trial team. LSW agreed to represent Dr. Porter on a contingency fee basis; if Dr. Porter did not prevail, LSW would not receive a fee.

5. In October 2024, my normal and customary hourly rate was \$375; effective January 1, 2025, my normal and customary hourly rate was increased to \$395.

6. These were the rates I commonly charged, and have been paid by, my hourly clients, and I believe that these were reasonable rates at the time in this state, in light of my experience, training, and skill. In my opinion, the rates charged by other attorneys in this firm were also reasonable given their respective circumstances and given that other hourly clients readily paid those rates.

7. Attached as Exhibit A is a statement of all time recorded by LSW lawyers and paralegals through the filing of the Motion. On this statement, I have applied my normal and customary hourly rates of \$375 in 2024 and \$395 in 2025.

8. It is my practice, and the policy of LSW, to keep time records of work performed on a case contemporaneous with doing the work, making entries throughout the day as I perform various tasks. The statement attached as Exhibit A is based on my contemporaneous time records, and those of other professionals in the firm.

9. Overall, the amount of time expended on this matter was reasonable and appropriate, based on my experience.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Burlington, Vermont this 7th day of May, 2025.

LANGROCK SPERRY & WOOL, LLP



Eric D. Jones
210 College Street STE 400
Burlington, VT 05401
ejones@langrock.com
Phone: (802) 864-0217

2541937.v1

Langrock

SPERRY & WOOL

www.langrock.com

Misty B. Porter
mbporter@me.com

May 07, 2025
Client: 272397
Matter: 000001
Invoice #: 254177
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RE: Claim against DHMC et al.

For Professional Services Rendered Through May 07, 2025

Federal Tax I.D. No.: 03-0283046

| | |
|------------------------|---------------------|
| Total Services | \$165,380.50 |
| Total Current Charges | \$165,380.50 |
| PAY THIS AMOUNT | \$165,380.50 |

Remittance Advice

Payment is due 15 days from the invoice date.

If paying by check, please reference the invoice number or return this remittance page with your payment. Thank you.

Check Payable To:

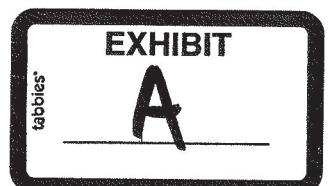
Langrock Sperry & Wool, LLP
Attn.: Accounts Receivable
111 S. Pleasant St.
Middlebury, VT 05753

eCheck & Credit Card:

Payments can be made by eCheck, American Express, Discover, MasterCard & VISA. To make a secure payment online, please [click here](#) or type the following information into your browser: <https://langrock.com/payments/>

MIDDLEBURY: 111 S. Pleasant St., Middlebury, VT 05753 | 802.388.6356
BURLINGTON: 210 College St., Suite 400, Burlington, VT 05401 | 802.864.0217

A Limited Liability Partnership Including a Professional Corporation





Misty B. Porter
mbporter@me.com

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RE: Claim against DHMC et al.

For Professional Services Rendered Through May 07, 2025

Federal Tax I.D. No.: 03-0283046

SERVICES

| Date | Person | Description of Services | Hours | Amount |
|------------|--------|--|-------|------------|
| 10/02/2024 | EDJ | Review and analyze background materials; analyze trial plan and strategy; analyze negotiation status; correspondence with Geoffrey Vitt regarding status. | 1.00 | \$375.00 |
| 10/03/2024 | EDJ | Review and analyze background material; analyze trial strategy. | 1.00 | \$375.00 |
| 10/08/2024 | EDJ | Telephone conference with Geoffrey Vitt regarding status and trial issues. | 0.50 | \$187.50 |
| 10/16/2024 | EDJ | Review and analyze trial planning tasks and strategy; review correspondence with special master regarding efforts to restart mediation. | 0.50 | \$187.50 |
| 10/17/2024 | EDJ | Conference with Misty Porter, Geoffrey Vitt and Sarah Nunan regarding status and trial preparation strategy. | 1.00 | \$375.00 |
| 10/21/2024 | EDJ | Review and analyze draft motion for status conference; draft proposed revisions to motion; correspondence with Geoffrey Vitt regarding same. | 0.70 | \$262.50 |
| 10/28/2024 | EDJ | Review and analyze pleadings and substantive motion papers to study factual record and positions asserted by the parties. | 1.50 | \$562.50 |
| 10/29/2024 | EDJ | Review and analyze record materials to assess facts and positions in preparation for trial planning. | 3.50 | \$1,312.50 |
| 10/30/2024 | EDJ | Review and analyze evidence; analyze trial strategy and pre-trial motions; correspondence with Geoffrey Vitt regarding status conference issues. | 1.50 | \$562.50 |
| 10/31/2024 | EDJ | File notice of appearance; continue detailed review of record materials to assess facts and positions. | 2.50 | \$937.50 |
| 11/04/2024 | EDJ | Review and analyze DHMC's opposition to motion for status conference and assess reply position. | 0.30 | \$112.50 |
| 11/05/2024 | EDJ | Telephone conference with Geoffrey Vitt regarding DH opposition to motion for status conference; draft revisions to draft reply memorandum; review and analyze Mr. Vitt's issues for pre-trial resolution. | 0.80 | \$300.00 |



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SERVICES

| Date | Person | Description of Services | Hours | Amount |
|------------|--------|---|-------|------------|
| 11/07/2024 | EDJ | Research subpoena and service issues; correspondence with Geoffrey Vitt regarding same. | 0.50 | \$187.50 |
| 11/11/2024 | EDJ | Correspondence with Geoffrey Vitt regarding strategy issues. | 0.50 | \$187.50 |
| 11/19/2024 | EDJ | Telephone conference with Geoffrey Vitt regarding pre-trial planning. | 0.50 | \$187.50 |
| 11/21/2024 | EDJ | Correspondence with Geoffrey Vitt regarding status, and client leave of absence issue. | 0.30 | \$112.50 |
| 12/04/2024 | EDJ | Detailed review and analysis of record, evidence, and positions to prepare for trial preparation conference and trial planning. | 3.50 | \$1,312.50 |
| 12/10/2024 | EDJ | Conference with Sarah Nunan and Geoffrey Vitt regarding trial planning and trial strategy; review and analyze case elements chart and witness list; review and analyze evidence. | 5.00 | \$1,875.00 |
| 12/11/2024 | EDJ | Analyze case presentation and trial strategy; review and analyze Vitt memorandum regarding trial presentation. | 2.00 | \$750.00 |
| 12/13/2024 | EDJ | Analyze trial themes memo; analyze trial presentation, witnesses and exhibits. | 1.00 | \$375.00 |
| 12/17/2024 | EDJ | Review and analyze documents regarding witnesses; analyze trial presentation strategy; video conference with Geoffrey Vitt and Sarah Nunan regarding trial preparation; research HIPAA issues regarding witness examinations. | 5.00 | \$1,875.00 |
| 12/18/2024 | BRG | Review of HIPAA Privacy Rule. | 0.50 | \$112.50 |
| 12/20/2024 | EDJ | Outline themes for opening statement; analyze case presentation. | 1.00 | \$375.00 |
| 12/30/2024 | EDJ | Review and analyze draft supplemental interrogatory answers; draft revisions; correspondence with Geoffrey Vitt and Sarah Nunan regarding same; analyze legal analysis regarding HIPAA issues at trial. | 1.50 | \$562.50 |
| 12/30/2024 | BRG | Review of HIPAA privacy rule and state statute regarding patient privilege. | 1.50 | \$337.50 |
| 01/02/2025 | EDJ | correspondence with Geoffrey Vitt and Sarah Nunan regarding case presentation. | 0.50 | \$187.50 |
| 01/06/2025 | EDJ | Review and analyze memorandum from Geoffrey Vitt regarding status conference; preparation for status conference; correspondence with Geoffrey Vitt regarding pre-trial motions and status conference. | 1.50 | \$592.50 |
| 01/08/2025 | EDJ | Correspondence with Geoffrey Vitt regarding pre-conference filing; prepare for trial conference; analyze trial strategy. | 1.00 | \$395.00 |
| 01/09/2025 | EDJ | Analyze trial preparation; vide conference with plaintiff attorney team to plan trial preparation and prepare for pre trial conference. | 2.30 | \$908.50 |
| 01/10/2025 | EDJ | Conference with SLL regarding juror questionnaires and trial preparation; review and analyze draft statement regarding case from Misty Porter; correspondence with counsel regarding draft statement and proposed revisions; review local rules regarding exhibits and voir dire. | 1.80 | \$711.00 |
| 01/10/2025 | SLL | Intra-office conference with Attorney Eric D. Jones regarding trial preparation; review client file; review Local Rules, voir dire process; telephone conference with court clerk regarding jury questionnaires. | 0.80 | \$124.00 |



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SERVICES

| Date | Person | Description of Services | Hours | Amount |
|------------|--------|--|-------|------------|
| 01/13/2025 | EDJ | Preparation for pre-trial conference; meeting with Geoffrey Vitt and Sarah Nunan regarding pre-trial conference; attend pre-trial conference. | 3.40 | \$1,343.00 |
| 01/14/2025 | EDJ | Research in support of motion to unseal documents; correspondence with Geoffrey Vitt regarding same. | 1.00 | \$395.00 |
| 01/15/2025 | EDJ | Legal research punitive damages and jury instruction issues; video conference with Plaintiff's trial team. | 1.50 | \$592.50 |
| 01/20/2025 | EDJ | Analyze punitive damages standards. | 0.80 | \$316.00 |
| 01/22/2025 | EDJ | Video conference with trial team to prepare for trial; review and analyze update claims chart. | 1.50 | \$592.50 |
| 01/25/2025 | EDJ | Review and analyze witness interview memos. | 0.50 | \$197.50 |
| 01/27/2025 | EDJ | Review and analyze draft opening statement; draft revisions. | 1.50 | \$592.50 |
| 01/30/2025 | EDJ | Review and analyze draft motion to unseal; research local rules; review and analyze draft opening statement; review and analyze case preparation chart; video conference with counsel team regarding trial preparation. | 1.80 | \$711.00 |
| 02/03/2025 | EDJ | Review and analyze revised motion to unseal documents; correspondence with plaintiff's trial team regarding same; correspondence with Geoffrey Vitt regarding settlement issues; analyze opening statement. | 1.70 | \$671.50 |
| 02/04/2025 | EDJ | Review and analyze opening statement; draft proposed revisions to opening statement; review revised motion to unseal records. | 2.80 | \$1,106.00 |
| 02/05/2025 | EDJ | Video conference with trial team regarding trial preparation. | 1.00 | \$395.00 |
| 02/19/2025 | EDJ | Review and analyze defendants' opposition to motion to unseal documents; analyze reply positions and strategy; video conference with trial team regarding strategy and trial preparation. | 2.00 | \$790.00 |
| 02/21/2025 | EDJ | Review and analyze five motions in limine filed by DHMC; analyze strategy and positions for reply briefing; review and analyze draft opposition to motion based on Cat's Paw theory; legal research regarding motions in limine; draft reply memorandum regarding motion to unseal documents. | 5.00 | \$1,975.00 |
| 02/24/2025 | EDJ | Review and analyze expert testimony issue to prepare response to motion in limine; legal research regarding Daubert standards; outline response arguments; video conference with Bob Bancroft regarding response to motion in limine; review and analyze expert reports and materials; review and analyze Bancroft deposition. | 4.60 | \$1,817.00 |
| 02/24/2025 | WER | Research Motion in Limine and Daubert Motion standards. | 0.25 | \$62.50 |
| 02/25/2025 | EDJ | Review and analyze materials regarding motion in limine to exclude expert testimony; draft opposition memorandum; legal research in support of opposition; telephone conference with Sarah Nunan and Geoffrey Vitt regarding witnesses. | 7.50 | \$2,962.50 |
| 02/26/2025 | EDJ | Draft opposition to motion to exclude expert testimony; video conference with trial team regarding trial preparation; review and analyze draft opposition to motion in limine regarding other physicians. | 3.50 | \$1,382.50 |
| 02/27/2025 | EDJ | Review and analyze draft opposition to motion in limine regarding plaintiff's qualifications; analyze arguments in opposition to collateral motions in limine. | 2.50 | \$987.50 |



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SERVICES

| Date | Person | Description of Services | Hours | Amount |
|------------|--------|--|-------|------------|
| 02/28/2025 | EDJ | Review and analyze opposition to motion to quash trial subpoena; draft response to defense counsel's letter regarding alleged ex parte communications; final review of oppositions to motions in limine. | 1.50 | \$592.50 |
| 03/01/2025 | EDJ | Telephone conference with Geoffrey Vitt and Sarah Nunan regarding status and response to motions in limine. | 0.30 | \$118.50 |
| 03/03/2025 | AJB | Intra-office conference with Attorney Eric D. Jones regarding jury instructions. | 0.20 | \$83.00 |
| 03/03/2025 | EDJ | Conference with Sarah Nunan regarding trial preparation plan; evidence training at federal court house; analyze jury instructions; analyze witness list; draft correspondence with Defense counsel regarding alleged ex parte communication; telephone conference with Geoffrey Vitt regarding damages issues; legal research regarding damages issues. | 4.50 | \$1,777.50 |
| 03/03/2025 | SLL | Tech overview at courthouse. | 0.50 | \$77.50 |
| 03/04/2025 | EDJ | Video conference with trial team regarding trial preparation; research voir dire issues; research Vermont health care whistleblower statute; prepare for witness interviews and witness testimony outlines; review and analyze draft witness outline. | 4.70 | \$1,856.50 |
| 03/04/2025 | SLL | Telephone conference with Clerk's office regarding jury panel; e-mail messages with Attorney Eric D. Jones. | 0.20 | \$31.00 |
| 03/05/2025 | EDJ | Telephone conference with Sarah Nunan regarding trial preparation; video conference with trial team regarding status and trial preparation; meeting with witness regarding trial testimony; draft amended complaint; review and analyze documents for exhibits; review and analyze juror questionnaires; review and analyze deposition of Maria Padin. | 7.50 | \$2,962.50 |
| 03/05/2025 | SLL | Receipt of jury questionnaires from Clerk's office; e-mail messages with Clerk's office; Intra-office conference with Attorney Eric D. Jones regarding jury panel. | 0.30 | \$46.50 |
| 03/05/2025 | SLL | Prepare of summary of jurors; e-mail messages with Attorney Eric D. Jones. | 1.40 | \$217.00 |
| 03/06/2025 | AJB | Draft and revise jury instructions. | 4.00 | \$1,660.00 |
| 03/06/2025 | EDJ | Preparation for motions hearing; analyze hearing on damages expert; review and analyze juror questionnaires; preparation for voir dire; video conference with trial team to prepare for trial; review and analyze Merrens deposition to prepare for trial testimony. | 7.50 | \$2,962.50 |
| 03/07/2025 | AJB | Draft and revise jury instructions; legal research regarding the same; intra-office conferences with Attorney Eric D. Jones regarding the same. | 4.90 | \$2,033.50 |
| 03/07/2025 | EDJ | Review and analyze draft motion to amend complaint; correspondence with trial team regarding same; video conference with trial team regarding trial preparation; video conference with witness regarding testimony; update witness outline; analyze trial presentation strategy; analyze jury instructions; review reply briefing regarding motions in limine; review and revise proposed jury instructions; review and analyze proposed witness list. | 6.70 | \$2,646.50 |



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SERVICES

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|------------|--------|--|-------|------------|
| 03/08/2025 | EDJ | Draft jury instructions; review and analyze witness list; draft witness outlines. | 3.80 | \$1,501.00 |
| 03/09/2025 | EDJ | Revise jury instructions; draft witness outline prepare for trial. | 2.50 | \$987.50 |
| 03/10/2025 | EDJ | Legal research damages issues (including gross up awards and front pay) and expert testimony issues in preparation for motion in limine hearing; review and analyze proposed witness list; video conference with trial team to prepare for trial; video conference with witness regarding trial preparation; review and analyze exhibits for disclosure on exhibit list; review draft jury instructions and prepare same for filing and service; preparation for meeting with Dr. Bancroft to prepare for hearing; review and analyze defendants' pre-trial filings. | 7.80 | \$3,081.00 |
| 03/11/2025 | EDJ | Review and analyze DH's pre-trial submissions (jury instructions, exhibit list, witness list, reply brief, etc.); Correspondence with Bob Bancroft regarding Daubert motion; preparation for motions hearing; video conference with trial team; outline oral arguments regarding cat's paw theory. | 5.00 | \$1,975.00 |
| 03/12/2025 | AJB | Receipt and review of defendants' proposed jury instructions; Intra-office conference with Attorney Eric D. Jones regarding the same. | 0.50 | \$207.50 |
| 03/12/2025 | EDJ | Preparation for hearing on pre-trial motions; video conference with trial team; preparation for trial; legal research regarding Cat's Paw issues. | 6.50 | \$2,567.50 |
| 03/13/2025 | EDJ | Research in support of positions for motions hearing; preparation for motions hearing; preparation for trial; video conference with trial team regarding trial. | 6.50 | \$2,567.50 |
| 03/14/2025 | EDJ | Preparation for pretrial motions hearing; correspondence with Bob Bancroft regarding same; correspondence with client regarding same; attend court hearing; correspondence with client regarding status post-hearing. | 8.00 | \$3,160.00 |
| 03/14/2025 | SLL | Revise jury list; prepare jury stickers; e-mail messages with Attorney Eric D. Jones. | 1.20 | \$186.00 |
| 03/16/2025 | EDJ | Preparation for trial; analyze evidentiary issues; outline Maria Padin testimony; review and analyze documents for exhibits. | 5.00 | \$1,975.00 |
| 03/17/2025 | EDJ | Prepare for trial (prepare witness outlines; review and analyze exhibits to assess stipulations; meet with witnesses to prepare for trial; prepare for voir dire). | 8.00 | \$3,160.00 |
| 03/17/2025 | SLL | Intra-office conferences with team; extract and organize Defendants' exhibits from documents produced. | 3.60 | \$558.00 |
| 03/18/2025 | EDJ | Conference with court personnel regarding court room issues; preparation for trial (damages analysis, conference with Bob Bancroft, conferences with witnesses; outline testimony and evidence; review and analyze juror questionnaires). | 8.50 | \$3,357.50 |
| 03/18/2025 | SLL | Prepare trial exhibit binders. | 3.80 | \$589.00 |
| 03/18/2025 | SLL | Prepare trial exhibit binders; receipt and review of e-mail message from USDC with juror update; revise jury stickers/spreadsheet; intra-office conference with Attorney Eric D. Jones. | 3.30 | \$511.50 |



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SERVICES

| Date | Person | Description of Services | Hours | Amount |
|------------|--------|---|-------|------------|
| 03/19/2025 | EDJ | Preparation for trial (prepare Misty Porter testimony, review and analyze exhibits, review and analyze opening statement, prepare voir dire; review and analyze Merrens testimony to prepare for cross). | 8.80 | \$3,476.00 |
| 03/19/2025 | SLL | Prepare trial exhibit binders; prepare jury box board. | 3.80 | \$589.00 |
| 03/20/2025 | EDJ | Trial preparation (voir dire outline, analyze damages and expert testimony, prepare cross examination). | 6.80 | \$2,686.00 |
| 03/20/2025 | SLL | Prepare trial exhibit binders. | 2.70 | \$418.50 |
| 03/21/2025 | EDJ | Preparation for trial; draft response to Defendants' renewed motion to exclude expert testimony; draft outlines for testimony and cross examination; review and analyze exhibits. | 7.00 | \$2,765.00 |
| 03/21/2025 | SLL | Prepare trial exhibit binders (Porter and DH); receipt and review of e-mail message from USDC with juror update; revise jury info spreadsheet and stickers; e-mail messages with Attorney Eric D. Jones; meeting with team. | 5.20 | \$806.00 |
| 03/22/2025 | EDJ | Preparation for trial (voir dire outline; opening statement; cross examination outline; exhibit review). | 6.00 | \$2,370.00 |
| 03/23/2025 | EDJ | Preparation for trial. | 9.00 | \$3,555.00 |
| 03/23/2025 | SLL | Prepare trial exhibit binders; meet with team. | 5.70 | \$883.50 |
| 03/24/2025 | EDJ | Preparation for trial; attend trial; prepare for continued trial. | 12.00 | \$4,740.00 |
| 03/24/2025 | SLL | [NO CHARGE] Attend jury draw. | 9.00 | \$0.00 |
| 03/25/2025 | EDJ | Preparation for trial; attend trial; prepare for continued trial. | 11.50 | \$4,542.50 |
| 03/25/2025 | SLL | Prepare trial exhibit binders. | 1.00 | \$155.00 |
| 03/25/2025 | SLL | [NO CHARGE] Attend trial. | 1.00 | \$0.00 |
| 03/26/2025 | EDJ | Preparation for trial; trial; prepare for continued trial. | 11.00 | \$4,345.00 |
| 03/26/2025 | SLL | Prepare trial exhibit binders. | 0.80 | \$124.00 |
| 03/26/2025 | SLL | [NO CHARGE] Attend trial. | 1.80 | \$0.00 |
| 03/26/2025 | SLL | Review e-mail message from Attorney Megan Martinez with list of missing items; review documents produced; update trial exhibit binders with missing items; telephone conferences and e-mail messages with Attorney Eric D. Jones and Attorney Sarah Nunan; prepare subpoenas and witness checks for Navid Esfandiari, Emily Baker, Katrina Thorstensen, Dennis Seguin; deliver same to court; meet with team. | 4.00 | \$620.00 |
| 03/27/2025 | EDJ | Preparation for trial; attend trial; prepare for continued trial. | 12.00 | \$4,740.00 |
| 03/28/2025 | EDJ | Preparation for trial; trial; conference with trial team. | 9.50 | \$3,752.50 |
| 03/29/2025 | EDJ | Prepare for continued trial; prepare examination of Ed Merrens; review and analyze Defendant's motion regarding Dr. Bancroft; outline response arguments. | 9.50 | \$3,752.50 |
| 03/30/2025 | EDJ | Prepare for trial; review and revise opposition to third motion in limine regarding Dr. Bancroft. | 7.00 | \$2,765.00 |
| 03/31/2025 | EDJ | Preparation for trial; trial; preparation for continuation of trial. | 11.50 | \$4,542.50 |
| 04/01/2025 | EDJ | Prepare for trial; trial; preparation for continued trial. | 12.50 | \$4,937.50 |
| 04/02/2025 | EDJ | Prepare for trial; trial; prepare for continued trial. | 11.50 | \$4,542.50 |



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|-----------------------------|--------|--|--------|--------------|
| 04/03/2025 | EDJ | Prepare for continued trial; trial; preparation for continued trial. | 12.00 | \$4,740.00 |
| 04/04/2025 | EDJ | Prepare for trial; trial; draft closing argument. | 8.00 | \$3,160.00 |
| 04/05/2025 | EDJ | Draft Closing arguments; review and analyze proposed jury instructions; conference with trial team. | 6.00 | \$2,370.00 |
| 04/06/2025 | EDJ | Draft closing argument; conference with trial team. | 6.50 | \$2,567.50 |
| 04/07/2025 | EDJ | Review and analyze jury instructions; attend charge conference; review and analyze renewed motions to preclude; preparation for closing argument. | 7.00 | \$2,765.00 |
| 04/08/2025 | EDJ | Trial. | 6.00 | \$2,370.00 |
| 04/09/2025 | EDJ | Attend hearing regarding jury request for testimony; analyze positions; research jury access to transcripts. | 1.00 | \$395.00 |
| 04/10/2025 | EDJ | Research jury access to transcripts; outline positions regarding same; attend court hearing regarding transcripts; attend hearing. | 4.50 | \$1,777.50 |
| 04/14/2025 | EDJ | Analyze post trial issues; research fee petition issues. | 1.30 | \$513.50 |
| 04/15/2025 | EDJ | Research recovery of fees and costs; review and analyze attorneys' fees and costs entries. | 1.50 | \$592.50 |
| 04/16/2025 | EDJ | Research in support of fee petition; analyze post trial motions and positions (interest, costs, fees, etc.). | 1.50 | \$592.50 |
| 04/18/2025 | EDJ | Draft fee petition; draft revisions to motion for pre-judgment interest; telephone conference with Geoffrey Vitt and Sarah Merlo regarding prejudgment interest issues. | 2.40 | \$948.00 |
| 04/21/2025 | EDJ | Analysis of interest calculations in support of motion for prejudgment interest; outline arguments for motion for pre-judgment interest. | 0.80 | \$316.00 |
| 04/23/2025 | EDJ | Review and analyze draft motion for interest; review DH message regarding motion for clarification; telephone conference with Geoffrey Judd Vitt and Sarah Nunan regarding post trial motions and positions. | 0.80 | \$316.00 |
| 04/28/2025 | EDJ | Review and analyze judgment, notice to litigants, and post-verdict motions; analyze strategy and positions; research motion to alter or amend the judgment; video conference with trial team regarding post-verdict motions. | 1.80 | \$711.00 |
| 04/30/2025 | EDJ | Draft papers in support of motion for attorneys' fees and bill of costs; research in support of motions. | 3.50 | \$1,382.50 |
| 05/01/2025 | EDJ | Draft revisions to fee petition papers. | 0.80 | \$316.00 |
| 05/05/2025 | EDJ | Review and revise papers in support of fee petition; research motion to alter or amend the judgment. | 1.30 | \$513.50 |
| 05/06/2025 | EDJ | Video conference with Porter team regarding post-trial motions and issues; revise declaration in support of motion for fees; draft revisions to motion for fees; outline motion to alter or amend the judgment. | 1.20 | \$474.00 |
| 05/07/2025 | EDJ | Final review of and revisions to papers in support of fee petition, and motion to alter or amend the judgment. | 1.00 | \$395.00 |
| Total Professional Services | | | 456.05 | \$165,380.50 |



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PERSON RECAP

| Person | | | Hours | Rate | Amount |
|------------------------|---------------------|-----------|--------|----------|---------------------|
| AJB | Alison J. Bell | Partner | 9.60 | \$415.00 | \$3,984.00 |
| EDJ | Eric D. Jones | Partner | 358.00 | \$395.00 | \$141,410.00 |
| EDJ | Eric D. Jones | Partner | 36.10 | \$375.00 | \$13,537.50 |
| WER | Wendy E. Radcliff | Associate | 0.25 | \$250.00 | \$62.50 |
| BRG | Bridget R. Grace | Associate | 2.00 | \$225.00 | \$450.00 |
| SLL | Sheri L. Lehouiller | Paralegal | 11.80 | \$0.00 | \$0.00 |
| SLL | Sheri L. Lehouiller | Paralegal | 38.30 | \$155.00 | \$5,936.50 |
| Total Services | | | | | \$165,380.50 |
| Total Current Charges | | | | | \$165,380.50 |
| PAY THIS AMOUNT | | | | | \$165,380.50 |